

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DEXIA SA/NV; DEXIA HOLDINGS, INC.;
FSA ASSET MANAGEMENT LLC; DEXIA
CRÉDIT LOCAL SA,

Plaintiffs,

v.

BEAR, STEARNS & CO. INC., THE BEAR
STEARNS COMPANIES, INC., BEAR
STEARNS ASSET BACKED SECURITIES I
LLC, EMC MORTGAGE LLC (f/k/a EMC
MORTGAGE CORPORATION),
STRUCTURED ASSET MORTGAGE
INVESTMENTS II INC., J.P. MORGAN
ACCEPTANCE CORPORATION I, J.P.
MORGAN MORTGAGE ACQUISITION
CORPORATION., J.P. MORGAN
SECURITIES LLC (f/k/a JPMORGAN
SECURITIES INC.), WAMU ASSET
ACCEPTANCE CORP., WAMU CAPITAL
CORP., WAMU MORTGAGE SECURITIES,
JPMORGAN CHASE & CO., and JPMORGAN
CHASE BANK, N.A.,

Defendants.

12-cv-4761 (JSR)

**DECLARATION OF TIMOTHY A. DELANGE IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Timothy A. DeLange, hereby declares under penalty of perjury that the following is true and correct. I am admitted to practice before this Court *pro hac vice* and am partner with the law firm of Bernstein Litowitz Berger & Grossmann LLP, counsel for Dexia SA/NV, Dexia Holdings, Inc., FSA Asset Management LLC, and Dexia Crédit Local SA.

Pursuant to prior approval of the Court, Plaintiffs submit Exhibits 1-51 on CD as exhibits to the Declaration of John D. Hendrickson dated February 4, 2013. Plaintiffs also submit Exhibits 52-58, which are attached as exhibits to the Declaration of Jonathan M. Peterson dated February 4, 2013.

Where feasible, certain of the documents listed below have been submitted only as excerpts to protect non-party borrower information, pursuant to the October 1, 2012 Protective Order in this action.

1. Attached as Exhibit 59 are true and correct copies of excerpts of the Deposition of Michael B. Nierenberg dated January 15, 2013.

2. Attached as Exhibit 60 are true and correct copies of excerpts of the Deposition of Jeffrey Verschleiser dated January 11, 2013.

3. Attached as Exhibit 61 are true and correct copies of excerpts of the Deposition of Mary Haggerty dated December 19, 2012.

4. Attached as Exhibit 62 are true and correct copies of excerpts of the Deposition of Seth M. Fenton dated January 18, 2013.

5. Attached as Exhibit 63 is a true and correct copy of Plaintiffs' Exhibit 325, an email dated November 20, 2006 with beginning bates number, JPMC_DEX_001487074.

6. Attached as Exhibit 64 are true and correct copies of excerpts of the Deposition of David Beck dated December 7, 2012.

7. Attached as Exhibit 65 are true and correct copies of excerpts of the Deposition of Robert Miller dated February 1, 2013.

8. Attached as Exhibit 66 are true and correct copies of excerpts of the Deposition of Douglas Potolsky dated January 25, 2013.

9. Attached as Exhibit 67 is a true and correct copy of a Memorandum of Points and Authorities in Support of JPMorgan Chase Bank, N.A. and Washington Mutual Mortgage Securities Corporation's Motion to Dismiss and for Partial Summary Judgment submitted in *Deutsche Bank Nat'l Trust Co. v. Fed. Deposit Ins. Corp., et al.* No. 1:09-cv-1656 (RMC).

10. Attached as Exhibit 68 are true and correct copies of excerpts of the Deposition of Hongfei Zhang dated November 27, 2012.

11. Attached as Exhibit 69 is a true and correct copy of the Prospectus Supplement for the WMABS Series 2006-HE2 Trust dated May 23, 2006, with beginning bates number JPMC_DEX_000070836.

12. Attached as Exhibit 70 are true and correct copies of excerpts of the Deposition of Ilya Kolchinsky dated January 30, 2013.

13. Attached as Exhibit 71 are true and correct copies of excerpts of the Deposition of Christopher M. Gething dated January 31, 2013.

14. Attached as Exhibit 72 is Plaintiffs' Appendix A: Defendants' Pre-Trade Representations to FSAM dated February 4, 2013.

15. Attached as Exhibit 73 are true and correct copies of excerpts of the Deposition of Jake Hendrickson dated December 21, 2012.

16. Attached as Exhibit 74 is a true and correct copy of Plaintiffs' Exhibit 528, titled Current Opportunities in the Non-Agency Market dated August 1, 2006, with beginning bates number JPMC_DEX_000733776.

17. Attached as Exhibit 75 are true and correct copies of excerpts of the Deposition of William C. Buell dated January 29, 2012.

18. Attached as Exhibit 76 are true and correct copies of excerpts of the Deposition of Joel Readence dated January 23, 2013.

19. Attached as Exhibit 77 is a true and correct copy of Plaintiffs' Exhibit 556, the testimony of Vicki Beal before the Financial Crisis Inquiry Commission on September 23, 2010.

20. Attached as Exhibit 78 is a true and correct copy of Plaintiffs' Exhibit 349, an email dated October 17, 2006, with beginning bates number JPMC_DEX_002919682.

21. Attached as Exhibit 79 is a true and correct copy of Plaintiffs' Exhibit 354, a TMG Quarterly Review dated May 15, 2007, with beginning bates number JPMC_DEX_008448499.

22. Attached as Exhibit 80 is a true and correct copy of Plaintiffs' Exhibit 548, a "Seller Commentary Report," dated May 10, 2007, with beginning bates number JPMC_DEX_000830858.

23. Attached as Exhibit 81 is a true and correct copy of Plaintiffs' Exhibit 549, a "Seller Scorecard," dated May 10, 2007, with beginning bates number JPMC_DEX_010991335.

24. Attached as Exhibit 82 is a true and correct copy of Plaintiffs' Exhibit 374, an email dated June 27, 2007, with beginning bates number JPMC_DEX_008469356.

25. Attached as Exhibit 83 is a true and correct copy of an email dated April 18, 2007, with beginning bates number JPMC_DEX_008469375.

26. Attached as Exhibit 84 is a true and correct copy of an email dated March 2, 2006, with beginning bates number JPMC_DEX_001907274.

27. Attached as Exhibit 85 is a true and correct copy of an email dated March 13, 2006 with beginning bates number JPMC_DEX_001563557.

28. Attached as Exhibit 86 is a true and correct copy of an email dated March 30, 2006 with beginning bates number JPMC_DEX_001905169.

29. Attached as Exhibit 87 is a true and correct copy of an email dated March 29, 2006 with beginning bates number JPMC_DEX_008623406.

30. Attached as Exhibit 88 is a true and correct copy of an email dated April 27, 2006 with beginning bates number JPMC_DEX_001901259.

31. Attached as Exhibit 89 is a true and correct copy of Plaintiffs' Exhibit 560 with beginning bates number JPMC_DEX_008588241.

32. Attached as Exhibit 90 is a true and correct copy of an email dated February 3, 2006 with beginning bates number JPMC_DEX_001905755.

33. Attached as Exhibit 91 is a true and correct copy of an email dated February 2, 2006 with beginning bates number JPMC_DEX_001856580.

34. Attached as Exhibit 92 is a true and correct copy Plaintiffs' Exhibit 363, an email dated February 3, 2006 with beginning bates number JPMC_DEX_001887620.

35. Attached as Exhibit 93 is a true and correct copy of an email dated February 24, 2006 with beginning bates number JPMC_DEX_001901911.

36. Attached as Exhibit 94 is a true and correct copy of Plaintiffs' Exhibit 367, an email dated March 17, 2006 with beginning bates number JPMC_DEX_008574046.

37. Attached as Exhibit 95 is a true and correct copy of Plaintiffs' Exhibit 368, an email dated March 17, 2006 with beginning bates number JPMC_DEX_002933714.

38. Attached as Exhibit 96 is a true and correct copy of an email dated March 20, 2006 with beginning bates number JPMC_DEX_002938630.

39. Attached as Exhibit 97 is a true and correct copy of an email dated January 8, 2007 with beginning bates number JPMC_DEX_001667942.

40. Attached as Exhibit 98 is a true and correct copy of JPMAC 2006-NC1 Marketing Strats dated March 29, 2006 with beginning bates number DEX_JPM_00202036.

41. Attached as Exhibit 99 is a true and correct copy of Plaintiffs' Exhibit 365, a JPMAC 2006-NC1 Term Sheet dated April 3, 2006 with beginning bates number DEX_JPM_00202228.

42. Attached as Exhibit 100 is a true and correct copy of JPMAC 2006-NC1 Preliminary Prospectus Supplement dated April 5, 2006 with beginning bates number DEX_JPM_00202406.

43. Attached as Exhibit 101 is a true and correct copy of Plaintiffs' Exhibit 366, a Prospectus Supplement dated April 5, 2006 with beginning bates number JPMC_DEX_000402629.

44. Attached as Exhibit 102 is a true and correct copy of an email dated September 6, 2006 with beginning bates number JPMC_DEX_001820104.

45. Attached as Exhibit 103 is a true and correct copy of Plaintiffs' Exhibit 382, an email dated September 18, 2006 with beginning bates number JPMC_DEX_001820151.

46. Attached as Exhibit 104 is a true and correct copy of Plaintiffs' Exhibit 377, an email dated September 27, 2006 with beginning bates number JPMC_DEX_001039813.

47. Attached as Exhibit 105 is a true and correct copy of Plaintiffs' Exhibit 383, an attachment to Exhibit 104.

48. Attached as Exhibit 106 is a true and correct copy of an email dated October 4, 2006 with beginning bates number JPMC_DEX_001840632.

49. Attached as Exhibit 107 is a true and correct copy of Plaintiffs' Exhibit 388, an email dated April 6, 2006 with beginning bates number JPMC_DEX_001894365.

50. Attached as Exhibit 108 is a true and correct copy of Plaintiffs' Exhibit 389, an email dated April 18, 2006 with beginning bates number JPMC_DEX_001904126.

51. Attached as Exhibit 109 is a true and correct copy of Plaintiffs' Exhibit 400, an email dated August 18, 2006 with beginning bates number JPMC_DEX_001839433.

52. Attached as Exhibit 110 is a true and correct copy of Plaintiffs' Exhibit 402, an email dated August 22, 2006 with beginning bates number JPMC_DEX_001832265.

53. Attached as Exhibit 111 is a true and correct copy of an email dated September 14, 2006 with beginning bates number JPMC_DEX_000137919.

54. Attached as Exhibit 112 is a true and correct copy of an email dated September 18, 2006 with beginning bates number JPMC_DEX_001914038.

55. Attached as Exhibit 113 is a true and correct copy of an email dated September 25, 2006 with beginning bates number JPMC_DEX_001731240.

56. Attached as Exhibit 114 is a true and correct copy of an email dated September 19, 2006 with beginning bates number JPMC_DEX_008914144.

57. Attached as Exhibit 115 are true and correct copies of excerpts from the Deposition of Pattie Sears dated January 9, 2013.

58. Attached as Exhibit 116 are true and correct copies of excerpts from the Deposition of Matthew Perkins dated February 1, 2013.

59. Attached as Exhibit 117 is a true and correct copy of excerpts of the testimony of John Mongelluzzo before the Financial Crisis Inquiry Commission dated September 29, 2010, with beginning bates number DEXDEP00034928.

60. Attached as Exhibit 118 is a true and correct copy of Plaintiffs' Exhibit 333, an email dated March 28, 2006 with beginning bates number DEXDEP00026304.

61. Attached as Exhibit 119 is a true and correct copy of Plaintiffs' Exhibit 173, an email dated February 14, 2005 with beginning bates number DEXDEP00026680.

62. Attached as Exhibit 120 is a true and correct copy of the Declaration of Judy Walter dated July 27, 2011 with beginning bates number DEXDEP00019029.

63. Attached as Exhibit 121 is a true and correct copy of Plaintiffs' Exhibit 204, an email dated May 11, 2005 with beginning bates number DEXDEP00026298.

64. Attached as Exhibit 122 is a true and correct copy of Plaintiffs' Exhibit 140, the testimony of Mary Haggerty before the Financial Crisis Inquiry Commission dated August 17, 2010.

65. Attached as Exhibit 123 is a true and correct copy of Plaintiffs' Exhibit 188, an email dated May 17, 2006 with beginning bates number DEXDEP00024625.

66. Attached as Exhibit 124 is a true and correct copy of Plaintiffs' Exhibit 151, an email dated October 17, 2005 with beginning bates number DEXDEP00022296.

67. Attached as Exhibit 125 is a true and correct copy of an email dated October 16, 2005 with beginning bates number JPMC_DEX_009105961.

68. Attached as Exhibit 126 is a true and correct copy of a report dated October 16, 2006 with beginning bates number JPMC_DEX_002442881.

69. Attached as Exhibit 127 is a true and correct copy of an email dated December 13, 2006 with beginning bates number JPMC_DEX_009096449.

70. Attached as Exhibit 128 is a true and correct copy of a due diligence report dated September 20, 2006 with beginning bates number JPMC_DEX_002522791.

71. Attached as Exhibit 129 is a true and correct copy of a due diligence report dated September 20, 2006 with beginning bates number JPMC_DEX_009386559.

72. Attached as Exhibit 130 is a true and correct copy of excerpts of a due diligence report dated September 20, 2006 with beginning bates number JPMC_DEX_009112899.

73. Attached as Exhibit 131 is a true and correct copy of excerpts of a due diligence report dated September 27, 2006 with beginning bates number JPMC_DEX_009107771.

74. Attached as Exhibit 132 is a true and correct copy of excerpts of a due diligence report dated September 27, 2006 with beginning bates number JPMC_DEX_009107746.

75. Attached as Exhibit 133 is a true and correct copy of excerpts a due diligence report dated September 27, 2006 with beginning bates number JPMC_DEX_009106789.

76. Attached as Exhibit 134 is a true and correct copy of Plaintiffs' Exhibit 335 an email dated April 4, 2005 with beginning bates number DEXDEP00020569.

77. Attached as Exhibit 135 is a true and correct copy of the Declaration of Cindy Hall dated September 6, 2011 with beginning bates number DEXDEP00019957.

78. Attached as Exhibit 136 is a true and correct copy of Plaintiffs' Exhibit 326, an email dated January 25, 2006 with beginning bates number JPMC_DEX_008889342.

79. Attached as Exhibit 137 is a true and correct copy of Plaintiffs' Exhibit 143, an email dated March 17, 2006 with beginning bates number JPMC_DEX_009272290.

80. Attached as Exhibit 138 is a true and correct copy of Plaintiffs' Exhibit 327, an email dated February 2, 2006 with beginning bates number JPMC_DEX_009268572.

81. Attached as Exhibit 139 is a true and correct copy of Plaintiffs' Exhibit 252, an email dated March 23, 2006 with beginning bates number DEXDEP00020260.

82. Attached as Exhibit 140 is a true and correct copy of Plaintiffs' Exhibit 338, an email dated March 16, 2007 with beginning bates number DEXDEP00026341.

83. Attached as Exhibit 141 is a true and correct copy of Plaintiffs' Exhibit 199, an email dated July 16, 2008 with beginning bates number DEXDEP00024655.

84. Attached as Exhibit 142 is a true and correct copy of Plaintiffs' Exhibit 163, an Internal Audit Report dated February 28, 2006 with beginning bates number DEX_JPM_00293304.

85. Attached as Exhibit 143 is a true and correct copy of the Deposition of Baron Silverstein dated June 4, 2010 with beginning bates number DEXDEP00026022.

86. Attached as Exhibit 144 is a true and correct copy of Plaintiffs' Exhibit 174, an email dated January 3, 2006 with beginning bates number DEXDEP00020767.

87. Attached as Exhibit 145 is a true and correct copy of the Deposition of Stephen Golden dated April 26, 2010 with beginning bates number DEXDEP00019052.

88. Attached as Exhibit 146 is a true and correct copy of Plaintiffs' Exhibit 243, a spreadsheet dated July 18, 2006 with beginning bates number JPMC_DEX_000934688.

89. Attached as Exhibit 147 is a true and correct copy of Plaintiffs' Exhibit 323, an email dated March 2, 2007 with beginning bates number JPMC_DEX_001784137.

90. Attached as Exhibit 148 is a true and correct copy of an email dated May 8, 2007 with beginning bates number DEXDEP00019783.

91. Attached as Exhibit 149 is a true and correct copy of Plaintiffs' Exhibit 177, an email dated July 17, 2006 with beginning bates number DEXDEP00020264.

92. Attached as Exhibit 150 is a true and correct copy of Plaintiffs' Exhibit 341 a report dated August 31, 2006 with beginning bates number DEXDEP00019494.

93. Attached as Exhibit 151 is a true and correct copy of Plaintiffs' Exhibit 259, an email dated May 9, 2007 with beginning bates number DEXDEP00020900.

94. Attached as Exhibit 152 is a true and copy of Plaintiffs' Exhibit 261, an email dated December 4, 2006 with beginning bates number JPMC_DEX_002053966.

95. Attached as Exhibit 153 is a true and correct copy of excerpts of the Deposition Transcript of Jeffrey Verschleiser before the Securities and Exchange Commission with beginning bates number DEXDEP00029395.

96. Attached as Exhibit 154 is a true and correct copy of a document with beginning bates number JPMC_DEX_013063907.

97. Attached as Exhibit 155 is a true and correct copy of Plaintiffs' Exhibit 159, an email dated November 13, 2006 with beginning bates number JPMC_DEX_001797681.

98. Attached as Exhibit 156 is a true and correct copy of an email dated April 22, 2006 with beginning bates number DEXDEP00029158.

99. Attached as Exhibit 157 is a true and correct copy of an email dated March 20, 2006 with beginning bates number JPMC_DEX_002055550

100. Attached as Exhibit 158 is a true and correct copy of a document with beginning bates number DEXDEP00000698.

101. Attached as Exhibit 159 are true and correct copies of excerpts of the Deposition of Frank Albus dated January 4, 2013.

102. Attached as Exhibit 160 are true and correct copies of excerpts of the Deposition of Jonathan Peterson dated November 8, 2012.

103. Attached as Exhibit 161 is a true and correct copy of the Expert Report of Joseph R. Mason, Ph.D. dated December 14, 2012.

104. Attached as Exhibit 163 is a true and correct copy of Plaintiffs' Responses and Objections to Defendants' Amended Notice of Deposition Pursuant to Rule 30(b)(6) dated November 5, 2012.

105. Attached as Exhibit 164 is a true and correct copy of the 2008 Purchase Agreement.

106. Attached as Exhibit 165 is a true and correct copy of the Expert Report of Paul A. Seguin Ph.D. dated December 6, 2012.

107. Attached as Exhibit 166 are true and correct copies of excerpts of the Deposition of Frank Datallo dated January 14, 2013.

108. Attached as Exhibit 167 is a true and correct copy of Plaintiffs' Exhibit 520 with beginning bates number DEX_JPM_00873062.

109. Attached as Exhibit 168 is a true and correct copy of Plaintiffs' Exhibit 342 with beginning bates number DEX_JPM_00288336.

110. Attached as Exhibit 169 is a true and correct copy of the Expert Report of Ilya Eric Kolchinsky dated December 6, 2012.

111. Attached as Exhibit 179 is a true and correct copy Plaintiffs' Supplemental Responses and Objections to Defendants' First Set of Interrogatories, Exhibit A, dated October 17, 2012.

112. Attached as Exhibit 180 is a true and correct copy of a document dated April 27, 2006 with beginning bates number DEX_JPM_00203771.

113. Attached as Exhibit 181 are true and correct copies of excerpts of the Deposition of Russell Brewer dated January 8, 2013.

114. Attached as Exhibit 182 is a true and accurate copy of a document with the beginning bates number DEX_JPM_000709584.

115. Attached as Exhibit 183 is a true and accurate copy of the Expert Report of Christopher M. Gething dated January 4, 2013.

116. Attached as Exhibit 184 is a true and accurate copy of the excerpts of the Deposition of Michael D. Coyne dated December 14, 2012.

117. Attached as Exhibit 185 are true and accurate copies of excerpts of the Deposition of Hugh F. Boyle dated December 13, 2012.

118. Attached as Exhibit 186 are true and accurate copies of excerpts of the Defendants Second Supplemental Response to Plaintiffs Interrogatories No.1 dated November 2, 2012.

119. Attached as Exhibit 187 is a true and accurate copy of a document with the beginning bates number JPMC_DEX_001901258.

120. Attached as Exhibit 188 is a true and accurate copy of a document with the beginning bates number JPMC_DEX_002082277.

121. Attached as Exhibit 189 is a true and accurate copy of Plaintiffs' Exhibit 179 an email dated March 24, 2006 with beginning bates number DEXDEP00022307.

122. Attached as Exhibit 190 is a true and accurate copy of Plaintiffs' Exhibit 197 an email dated November 1, 2005 with beginning bates number DEXDEP00025220.

123. Attached as Exhibit 191 is a true and accurate copy of Plaintiffs' Exhibit 12 a memo dated June 1, 2004.

124. Attached as Exhibit 192 is a true and accurate copy of Plaintiffs' Exhibit 13 a presentation dated April 18, 2006.

125. Attached as Exhibit 193 is a true and accurate copy of Plaintiffs' Exhibit 21 an email dated August 3, 2006 with beginning bates number DEXDEP00016835.

126. Attached as Exhibit 194 is a true and accurate copy of Plaintiffs' Exhibit 2 an email dated July 18, 2003 with beginning bates number DEXDEP00005967.

127. Attached as Exhibit 195 is a true and accurate copy of Plaintiffs' Exhibit 4 an email dated May 12, 2004 with beginning bates number DEXDEP00003691.

128. Attached as Exhibit 196 is a true and accurate copy of Plaintiffs' Exhibit 3 an email dated October 12, 2004 with beginning bates number DEXDEP00002093.

129. Attached as Exhibit 197 is a true and accurate copy of Plaintiffs' Exhibit 17 an email dated January 5, 2004 with beginning bates number DEXDEP00000130.

130. Attached as Exhibit 198 is a true and accurate copy of Plaintiffs' Exhibit 311 an email dated November 30, 2006 with beginning bates number DEXDEP00016781.

131. Attached as Exhibit 199 is a true and accurate copy of Plaintiffs' Exhibit 5 a memo dated June 3, 2005 beginning with bates number DEXDEP0005458.

134. Attached as Exhibit 202 is a true and accurate copy of Plaintiffs' Exhibit 6 a memo dated September 21, 2005.

135. Attached as Exhibit 203 is a true and correct copy of a document dated November 16, 2005 with beginning bates number DEXDEP00008262.

136 Attached as Exhibit 204 is a true and accurate copy of Plaintiffs' Exhibit 228 an email dated February 22, 2006 with beginning bates number DEXDEP00008472.

137 Attached as Exhibit 205 is a true and accurate copy of Plaintiffs' Exhibit 122 an email dated November 17, 2005 with beginning bates number DEXDEP00016718.

138 Attached as Exhibit 206 is a true and accurate copy of Plaintiffs' Exhibit 219 an email dated November 17, 2005 with beginning bates number DEXDEP00016718.

139. Attached as Exhibit 207 is a true and accurate copy of Plaintiffs' Exhibit 123 an email dated February 28, 2006 with beginning bates number DEXDEP00000766.

140. Attached as Exhibit 208 is a true and accurate copy of Plaintiffs' Exhibit 213.

141. Attached as Exhibit 209 is a true and accurate copy of Plaintiffs' Exhibit 10 an email dated December 13, 2005 with beginning bates number DEXDEP00005486.

142. Attached as Exhibit 210 is a true and accurate copy of Plaintiffs' Exhibit 16 a status report dated January 1, 2006 with beginning bates number DEXDEP00003898.

143. Attached as Exhibit 211 is a true and correct copy of a document dated May 22, 2006 with beginning bates number DEXDEP00008300.

144. Attached as Exhibit 212 is a true and correct copy of a document dated April 21, 2006 with beginning bates number DEXDEP00017596.

145. Attached as Exhibit 213 is a true and correct copy of a document dated August 20, 2007.

146. Attached as Exhibit 214 is a true and correct copy of a document dated June 23, 2006.

147. Attached as Exhibit 215 is a true and correct copy of a document dated May 24, 2006.

148. Attached as Exhibit 216 is a true and correct copy of a document dated March 2, 2006.

149. Attached as Exhibit 217 is a true and accurate copy of Plaintiffs' Exhibit 227 an email dated October 22, 2004 with beginning bates number DEXDEP00000482.

150. Attached as Exhibit 218 is a true and accurate copy of an email dated November 2, 2007 with beginning bates number DEXDEP00002338.

151. Attached as Exhibit 219 is a true and accurate copy of an email dated May 22, 2006 with beginning bates number DEXDEP00000760.

152. Attached as Exhibit 220 is a true and correct copy of a document dated January 5, 2006 with beginning bates number DEXDEP00002471.

153. Attached as Exhibit 221 is a true and correct copy of the Gephardt Transcript dated November 16, 2011 with beginning bates number DEXDEP00001133.

154. Attached as Exhibit 222 is a true and correct copy of a document dated May 22, 2006 with beginning bates number DEXDEP00008300.

155. Attached as Exhibit 223 is a true and accurate copy of Plaintiffs' Exhibit 25 an email dated January 1, 2007 with beginning bates number DEXDEP00005033.

156. Attached as Exhibit 224 is a true and accurate copy of Plaintiffs' Exhibit 119 an email dated April 30, 2007 with beginning bates number DEXDEP00000320.

157. Attached as Exhibit 225 is a true and accurate copy of Plaintiffs' Exhibit 240 an email dated April 5, 2007 with beginning bates number DEXDEP00223214.

158. Attached as Exhibit 226 is a true and accurate copy of Plaintiffs' Exhibit 117 an email dated August 8, 2006 with beginning bates number DEXDEP00000366.

159. Attached as Exhibit 227 is a true and accurate copy of an email dated February 22, 2007 with beginning bates number JPMC_DEX_001558915.

160. Attached as Exhibit 228 is a true and accurate copy of an email dated May 30, 2007 with beginning bates number JPMC_DEX_001414850.

161. Attached as Exhibit 229 is a true and accurate copy of an email dated March 21, 2007 with beginning bates number JPMC_DEX_001257920.

162. Attached as Exhibit 230 is a true and correct copy of a document dated March 21, 2006 with beginning bates number JPMC_DEX_001261396.

163. Attached as Exhibit 231 is a true and correct copy of an email dated March 29, 2006 with beginning bates number JPMC_DEX_002028344.

164. Attached as Exhibit 232 is a true and correct copy of Plaintiffs' Exhibit 116 an email dated March 22, 2006 with beginning bates number JPMC_DEX_002029484.

165. Attached as Exhibit 233 is a true and correct copy of a document dated May 22, 2006 with beginning bates number DEX_JPMC_00595074.

164. Attached as Exhibit 232 is a true and correct copy of Plaintiffs' Exhibit 116 an email dated March 22, 2006 with beginning bates number JPMC_DEX_002029484.

165. Attached as Exhibit 233 is a true and correct copy of a document dated May 22, 2006 with beginning bates number DEX_JPMC_00595074.

166. Attached as Exhibit 234 is a true and correct copy of a document dated January 12, 2007 with beginning bates number DEX_JPM_00714792.

167. Attached as Exhibit 235 is a true and correct copy of a document dated April 17, 2006 with beginning bates number DEX_JPM_00481882.

168. Attached as Exhibit 236 is a true and correct copy of a document dated October 2, 2006 with beginning bates number DEX_JPM_00549326.

169. Attached as Exhibit 237 is a true and correct copy of a document dated July 13, 2007 with beginning bates number JPMC_DEX_000591185.

170. Attached as Exhibit 238 are true and correct copies of excerpts of the Deposition of Cheryl Glory dated April 23, 2010.


171. Attached as Exhibit 239 is a true and correct copy of a document dated April 24, 2006 with beginning bates number JPMC_DEX_008623402.

172. Attached as Exhibit 240 is a true and correct copy of a document dated May 10, 2006 with beginning bates number JPMC_DEX_008990117.

173. Attached as Exhibit 241 is a true and correct copy of a document dated November 28, 2007 with beginning bates number JPMC_DEX_007678564.

174. Attached as Exhibit 242 is a true and correct copy of a Moody's Special Report dated March 26, 2008.

Executed on February 4, 2013
in New York, NY


Timothy A. DeLange